

# **EXHIBIT 5**

**From:** [Scott Drury](#)  
**To:** [FordyceT@gtlaw.com](mailto:FordyceT@gtlaw.com); [flynnk@gtlaw.com](mailto:flynnk@gtlaw.com)  
**Cc:** [Roshna Bala Keen](#); [Craig B. Futterman](#)  
**Subject:** Batchelor v. City of Chicago - Rule 37.2 Conference  
**Date:** Thursday, July 16, 2020 9:41:48 AM

---

Tiffany and Kyle:

Thank you for taking the time to speak with me yesterday. This confirms our Rule 37.2 conference during which we discussed Plaintiff's Third Set of Interrogatories to the City of Chicago ("Interrogatories") and Second Set of Requests for Production of Documents ("Requests for Production"). With respect to the Interrogatories, the parties discussed the City's objections to Interrogatory No. 1. The City contends the time period covered by the interrogatory is overly broad. On or before July 17, 2020, the City will provide Plaintiff with a time period it deems reasonable or let Plaintiff know if it will need additional time to make such a determination. The City has requested that Plaintiff remove the request for files related to sexual assaults. Plaintiff is considering the request.

Regarding the Requests for Production, because Request for Production No. 2 largely mirrors Interrogatory No. 1, the issues are the same as described above. With respect to Request for Production No. 1, the City contends that the time period for the requested polygraph policies and procedures is overly broad. Plaintiff disagrees. On or before July 17, 2020, the City will provide Plaintiff with a time period it deems reasonable or let Plaintiff know if it will need additional time to make such a determination. With respect to Request for Production No. 3, the parties are at impasse. The City contends the request seeks *Monell* discovery. Plaintiff disagrees. The request seeks information relevant to Plaintiff's claims against the individual polygraph defendants.

If any of the information in this email is incorrect, please let me know.

Scott R. Drury  
LOEVY & LOEVY  
311 N. Aberdeen, 3<sup>rd</sup> Floor  
Chicago, Illinois 60607  
312.243.5900